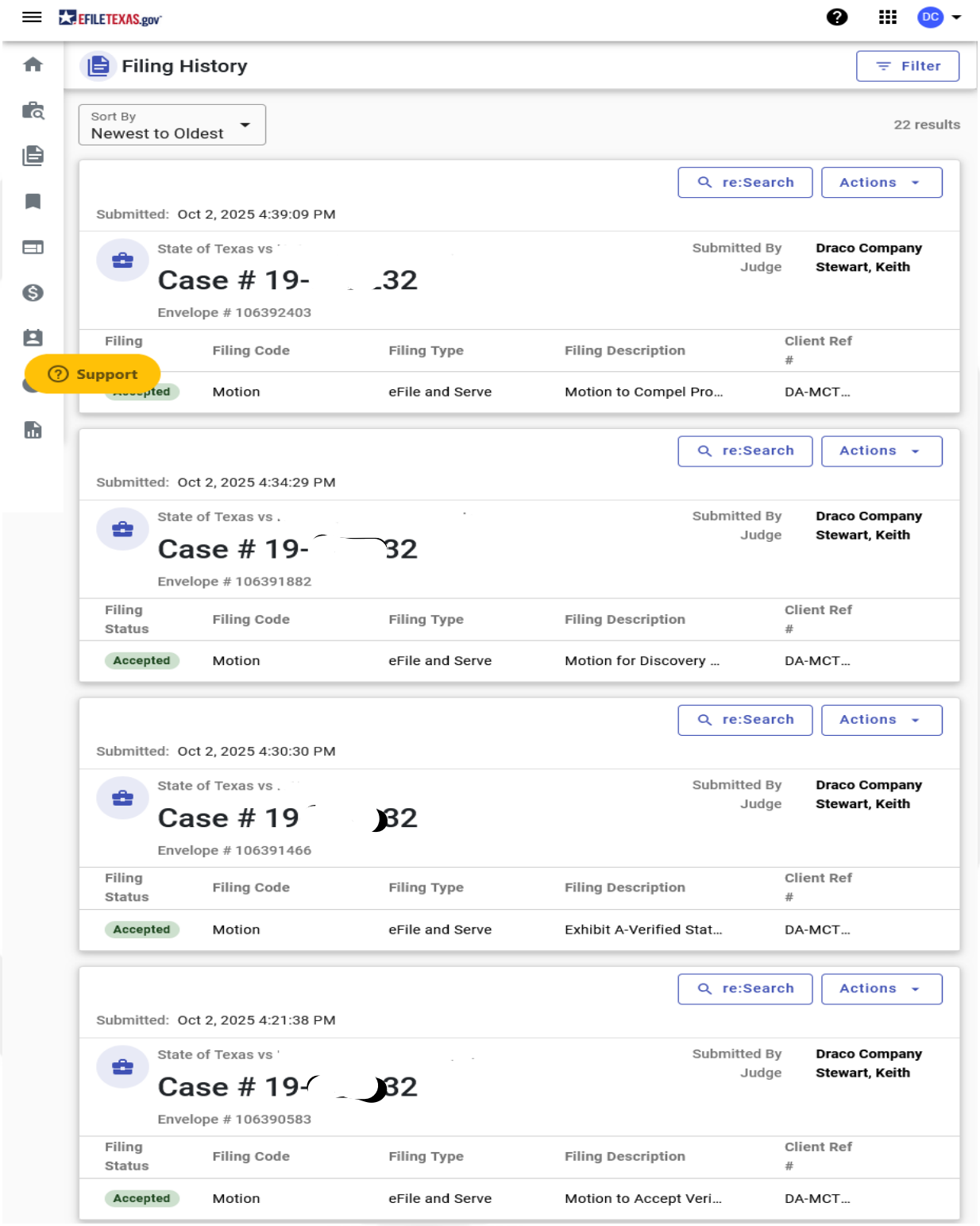
E-FILE ACCEPTANCE VERIFICATIONS - Redacted

Submitted on efiletexas.org on October 2, 2025



©2025 DRACO & COMPANY - All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

re:Search | Actions

Submitted: Oct 2, 2025 4:13:15 PM

State of Texas vs
Case # 19- 32
Envelope # 106389713

Submitted By: Draco Company
Judge: Stewart, Keith

Filing Status	Filing Code	Filing Type	Filing Description	Client Ref #
Accepted	Motion	eFile and Serve	Motion to Compel Cle…	DA-MCT…

re:Search | Actions

Submitted: Oct 2, 2025 4:06:24 PM

State of Texas vs
Case # 19- 32
Envelope # 106388986

Submitted By: Draco Company
Judge: Stewart, Keith

Filing Status	Filing Code	Filing Type	Filing Description	Client Ref #
Accepted	Motion	eFile and Serve	Motion to Quash Warr…	DA-MCT…

re:Search | Actions

Submitted: Oct 2, 2025 3:59:53 PM

State of Texas vs
Case # 19- 32
Envelope # 106388299

Submitted By: Draco Company
Judge: Stewart, Keith

Filing Status	Filing Code	Filing Type	Filing Description	Client Ref #
Accepted	Motion	eFile and Serve	Motion to Verify Reco…	DA-MCT…

re:Search | Actions

Submitted: Oct 2, 2025 3:35:56 PM

State of Texas vs
Case # 19- 32
Envelope # 106385870

Submitted By: Draco Company
Judge: Stewart, Keith

Filing Status	Filing Code	Filing Type	Filing Description	Client Ref #
Accepted	Motion	eFile and Serve	Motion to Recuse Acti…	DA-MCT…

Rows per page: 25 | 1-22 of 22

©2025 DRACO & COMPANY - All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19- 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO RECUSE ACTING JUDGE KEITH STEWART

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing *pro se*, and respectfully files this *Motion to Recuse Acting Judge Keith Stewart*. In support thereof, the Defendant would show the Court the following:

I. BACKGROUND AND PROCEDURAL HISTORY

1. **The Defendant was arrested on August 7, 2019.**
2. **On August 9, 2019, an application for court-appointed counsel was submitted, signed, and notarized by Berenice Greathouse, verifying the Defendant's indigent and unemployed status.**
3. **At the initial court date, the Defendant's court-appointed attorney, Darin John Ray[24003718], failed to appear. Instead, an unidentified woman appeared with a pre-signed scheduling order, which the Defendant was pressured to sign without confirmation that Attorney Ray had authorized it. The presiding Judge, Keith Stewart, allowed this to proceed.**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

4. **On September 30, 2019, the Defendant appeared in court and met Darin J. Ray for the first time since arrest. The Defendant specifically requested a new attorney as co-counsel, a request not properly addressed or explained by the court.**
5. **Subsequently, David Bluestein[02510700] was appointed attorney, as reflected in an "Order of Attorney Appointment" dated September 30, 2019, confirming the Defendant's presence in court on that date.**
6. **The Defendant filed three affidavits and a counterclaim on September 30, 2019. These were accepted into the court record.**
7. **Despite this, an "Order for Issuance of Capias" was entered on October 7, 2019, falsely stating that the Defendant failed to appear when called in court on September 30, 2019, and ordering forfeiture of the Defendant's bond and issuance of a $10,000 warrant.**
8. **The bailiff certificate supporting the forfeiture contradicts the court order, claiming the Defendant was called outside the courtroom and failed to appear despite reasonable time.**
9. **The Defendant has verified with the Court Reporter and Court Administrator that the Defendant was physically present in court on September 30, 2019, but transcripts confirming this have not been filed.**
10. **These procedural irregularities and misrepresentations have caused ongoing prejudice and harm to the Defendant, including wrongful bond forfeiture, issuance of an invalid warrant, loss of driver's license, and inability to work for over five years.**
11. **On May 8, 2020, at 3:56 PM, a document titled "Motion to Withdraw as Attorney of Record" was filed into the official court record by David Bluestein[02510700], the attorney previously appointed to the Defendant.**
12. **In Section 1 of that motion, Mr. Bluestein falsely claimed: "David Bluestein was court-appointed to the Defendant in the above-referenced misdemeanor cause. The Defendant failed to appear on September 30, 2019, and has not been rearrested."**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

13. This statement is materially false. The Defendant did appear in court on September 30, 2019, as proven by the following:

a. The Defendant personally submitted three affidavits and a counterclaim to the court clerk, which were accepted into the record around 11:19 AM on that day.

b. The "Order of Attorney Appointment" naming David Bluestein[02510700] was generated by Berenice Greathouse at 10:51 AM on the same day, clearly demonstrating the Defendant was present.

c. Following the end of court on September 30, 2019, the Defendant met David Bluestein[02510700] in person in the court corridor and spoke with him briefly. This meeting occurred after the court session had concluded, and the Defendant was among the last to leave the courtroom after court adjourned., aside from court personnel and law enforcement staff.

14. Despite this interaction, Mr. Bluestein claimed in an official filing that the Defendant never appeared and has not been rearrested — a demonstrably false assertion contradicted by court records and witness confirmation.

15. The Defendant requested return of the original affidavits submitted to the court on September 30, 2019, but they were never returned. Their current whereabouts are unknown, and court personnel have refused to respond to inquiries.

16. In Section 2 of Bluestein's withdrawal motion, he stated: "Court-appointed counsel David Bluestein[02510700] is changing employment, with an anticipated start date of May 18, 2020."

17. Based on these filings:

a. Mr. Bluestein was appointed on September 30, 2019.

b. A capias (warrant) was issued against the Defendant on October 7, 2019, based on false claims of non-appearance.

c. During his approximately 8-month appointment, Mr. Bluestein made no effort to communicate with or assist the Defendant.

d. He submitted no motions, no evidence, and no filings on behalf of the Defendant, other than his initial appointment and his withdrawal.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

e. The Defendant only became aware of the $10,000 warrant by accident, months later, while attempting to seek resolution over the phone.

18. Judge Keith Stewart allowed these knowingly false and unverified statements — including those by Mr. Bluestein — to remain in the official court record and take legal effect, resulting in forfeiture of bond and escalation to a felony-grade warrant.

19. These acts — and the court's endorsement of them — amount to a pattern of judicial misconduct and bias against the Defendant. These facts justify recusal under Texas Rule of Civil Procedure 18b(2)(a), which provides that a judge must recuse himself in any proceeding in which 'the judge's impartiality might reasonably be questioned.' This constitutes a continuing violation of the Defendant's right to due process and fair access to justice.

20. The Defendant never received proper or timely communication regarding Attorney David Bluestein's withdrawal as counsel on or around May 6, 2020. During the entire approximate seven-month period of Mr. Bluestein's appointment, he failed to make any effort to contact, communicate with, or otherwise engage with the Defendant regarding the status of the case or his legal representation. This complete absence of communication constitutes a fundamental breach of the Defendant's right to effective assistance of counsel and due process, resulting in substantial prejudice to the Defendant's ability to prepare and defend against the charges.

21. The Defendant was never notified of Attorney David Bluestein's intent to withdraw, nor was any consent given or communication received regarding his removal as court-appointed counsel. Although Attorney Bluestein included a Certificate of Service with his Motion to Withdraw filed on May 8, 2020, this document failed to reflect any actual or attempted service upon the Defendant. No copy was ever provided to the Defendant, no signature or acknowledgment of receipt was obtained, and no verifiable record of delivery was filed in court. The motion was submitted and accepted without the Defendant's knowledge or opportunity to respond.

22. Despite these deficiencies, the Court permitted Attorney Bluestein to formally withdraw without requiring verification of service or any proof that the Defendant had been informed of

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

the withdrawal or advised to obtain alternative representation. The Defendant was not made aware of the withdrawal and only discovered it through personal review of court records. During his time as appointed counsel, Mr. Bluestein filed no motions, submitted no evidence, and took no action to protect the Defendant's legal interests, apart from the initial appointment and the withdrawal itself.

23. The Court failed to appoint a replacement attorney, failed to notify the Defendant of the withdrawal, and failed to take any action to safeguard the Defendant's Sixth Amendment rights. The absence of any judicial inquiry or oversight into these failures constitutes a clear and continuing violation of the Defendant's constitutional right to notice, assistance of counsel, and due process under both state and federal law. This judicial inaction materially prejudiced the Defendant and further undermines the integrity of these proceedings.

II. GROUNDS FOR RECUSAL

24. The Defendant asserts that Judge Keith Stewart's conduct raises serious questions of impartiality and fairness due to:

- **a. Allowing unauthorized legal representation and coercion with a pre-signed contract.**
- **b. Accepting and entering false factual findings regarding the Defendant's presence in court.**
- **c. Ignoring documented evidence and affidavits proving the Defendant's compliance.**
- **d. Permitting issuance of a bond forfeiture and warrant based on fabricated claims.**
- **e. Failing to ensure Defendant's right to effective counsel and proper notice of attorney withdrawal.**
- **f. Overseeing procedural actions that have caused ongoing, substantial prejudice and constitutional violations.**

25. These actions violate the Defendant's constitutional right to due process and a fair trial and compromise the integrity of the judicial proceedings.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

III. CONCLUSION AND PRAYER

26. The facts presented above show a pattern of administrative negligence, attorney misconduct, and judicial endorsement of false statements and fabricated procedures. The continued participation of Judge Keith Stewart, under these circumstances, represents a conflict of interest, violates principles of impartial adjudication, and severely impairs the integrity of these proceedings.

27. WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Grant this Motion to Recuse Judge Keith Stewart;

b. Assign a different, impartial judge to preside over this case;

c. Conduct a hearing or investigation into the procedural improprieties detailed herein;

d. Issue any legal action, sanction, or relief deemed proper under Texas law in light of the facts stated; and

e. Grant any other relief, legal or equitable, to which the Defendant may be justly entitled.

Executed on this 1st day of October, 2025.

/s/

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ _____

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19- 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
	§	**DEFENDANT (Pro Se)**

MOTION TO QUASH WARRANT AND RESTORE BOND

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, , appearing pro se, and respectfully moves this Court to quash the outstanding warrant issued on or about October 7, 2019, for alleged failure to appear and to restore or refund the previously posted bond. In support of this Motion, the Defendant states as follows:

1. **The Defendant was present in court on September 30, 2019, as confirmed by multiple facts including the following:**

   a. Defendant filed and submitted three affidavits and a counterclaim to the court clerk on that date, which were accepted into the official record.

   b. The "Order of Attorney Appointment" for Attorney David Bluestein was signed and entered on the morning of September 30, 2019, specifically indicating that the Defendant was present.

   c. Defendant personally met with Attorney David Bluestein immediately following the court session in the courthouse corridor.

2. **Despite the Defendant's physical presence in court on September 30, 2019, an "Order for Issuance of Capias" was issued on October 7, 2019, falsely asserting that the Defendant failed**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

to appear and ordering forfeiture of the $750 bond along with issuance of a $10,000 capias warrant.

3. **The bailiff's certificate supporting the capias is inconsistent with court records and improperly claims the Defendant failed to appear when called, despite the Defendant being inside the courtroom during docket call and seen by court personnel.**
4. **The Defendant has confirmed with the court reporter, Sally Hepburn, that the official transcripts from September 30, 2019, include clear evidence of the Defendant's presence. Ms. Hepburn has acknowledged this via email but has refused to file the transcript unless the Defendant purchases a copy for $100.**
5. **The issuance of a capias warrant and bond forfeiture under false pretenses constitutes a miscarriage of justice and violates the Defendant's right to due process under the U.S. Constitution and the Texas Constitution.**
6. **No notice or opportunity to contest the forfeiture or address the warrant was ever provided to the Defendant, nor was the Defendant re-arrested or given an explanation for the judicial action taken in his absence.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Court:

a. Quash the October 7, 2019 warrant;

b. Vacate the bond forfeiture and order the immediate restoration or refund of the $750 bond previously posted, and award compensatory damages in the amount of $25,000 for the significant loss of time, income, and impairment of the Defendant's ability to work and drive resulting from the wrongful issuance of the warrant and related actions;

c. Correct the court record to reflect the Defendant's appearance on September 30, 2019;

d. Grant any further relief that this Court deems just and proper.

/s/ _____

©2025 , All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO QUASH WARRANT AND RESTORE BOND* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ I_____

THIS SPACE INTENTIONALLY LEFT BLANK

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
	§	**DEFENDANT (Pro Se)**

MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, appearing *pro se*, and pursuant to the Texas Code of Criminal Procedure Article 39.14 ("Michael Morton Act"), the Due Process Clause of the Fourteenth Amendment to the United States Constitution, Brady v. Maryland, 373 U.S. 83 (1963), and all other applicable rules and constitutional provisions governing the right to discovery, respectfully submits this Motion for Discovery of all evidence, records, and materials relevant to the alleged incident and arrest occurring on or about August 7, 2019.

This motion is made in good faith and is necessary to ensure a fair, transparent, and constitutionally sound defense. The Defendant asserts the following:

I. REQUESTED MATERIALS

The Defendant specifically requests that the prosecution and any associated government agencies promptly produce the following materials in full:

a. All Records, Files, and Documents:
All written or electronic records, files, notes, internal memos, reports, filings, emails, or other communications in the possession of the District Attorney's Office pertaining to the arrest,

©2025 , All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

investigation, detention, and prosecution of the Defendant, including all materials created before, during, and after the alleged incident.

b. Correspondence and Activity of Assistant District Attorneys:
All documentation, including emails, internal memos, meeting notes, and communications involving Assistant District Attorneys Darin John Ray [#24003718] and David Bluestein [#02510700], specifically addressing:

- **Their dates of assignment to this case.**
- **The scope and nature of their involvement.**
- **Any requests, motions, filings, or communications submitted by them in connection to this matter.**

c. Montgomery County Sheriff's Office Records:
All records held by the Montgomery County Sheriff's Office pertaining to the arrest, processing, booking, detention, or release of the Defendant on August 7, 2019, including but not limited to:

- **Incident reports.**
- **Arrest affidavits.**
- **Booking records.**
- **Surveillance footage.**
- **Body cam and dash cam footage.**
- **Internal communications related to the Defendant.**

d. Detention Facility Documents:
All records generated by or within any detention facility during or following the Defendant's arrest, including:

- **Intake forms.**

©2025 , All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

- **Logs.**
- **Medical evaluations.**
- **Phone recordings and logs.**
- **Jail activity reports.**

e. Witness Lists and Statements:

A complete list of all witnesses identified or consulted in this case, including:

- **Full names.**
- **Job titles or relationships to the case.**
- **Contact information.**
- **Statements, interviews, summaries, or other related materials.**

f. Charging Instruments and Legal Filings:

A full and complete copy of all legal documents filed or created in this matter, including but not limited to:

- **Complaint affidavits.**
- **Charging instruments.**
- **Informations.**
- **Indictments.**
- **Warrants.**
- **Capias documents.**
- **Bond forfeiture filings.**

g. Identification of All Prosecutors Involved:

A full list of all Assistant District Attorneys who have had any interaction with or made any filings in this matter, along with:

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

- **Dates of involvement.**
- **Nature and scope of duties performed.**
- **Any ex parte communications, filings, or authorizations made without Defendant's knowledge.**

h. Exculpatory Evidence and Brady Material:

Any and all exculpatory evidence known to the State or any of its agents, whether or not intended for use at trial, including but not limited to:

- **Evidence that may mitigate punishment.**
- **Evidence that may contradict the prosecution's theory.**
- **Evidence impeaching any State witness.**
- **Evidence corroborating the Defendant's statements or testimony.**

II. LEGAL GROUNDS FOR DISCOVERY

The Defendant invokes the following legal authorities in support of this request:

- **Brady v. Maryland, 373 U.S. 83 (1963): Requiring the prosecution to turn over all exculpatory evidence to the defense.**
- **Texas Code of Criminal Procedure, Article 39.14: Entitling the Defendant to inspect and obtain any evidence in the possession of the State related to the alleged offense.**
- **U.S. Const. Amend. V, VI, and XIV: Guaranteeing due process, the right to confront witnesses, and a fair trial.**
- **Texas Constitution, Article I, Sections 10 and 19: Guaranteeing rights to due course of law and to be informed of the nature and cause of the accusation.**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

III. NOTICE OF PRESERVATION AND FUTURE USE

The Defendant explicitly requests that all materials responsive to this Motion be preserved in full, unaltered form. Any failure to provide timely disclosure or any evidence of spoliation, withholding, or redaction may serve as grounds for further motions including:

- **Motion to Suppress Evidence**
- **Motion to Dismiss for Due Process Violations**
- **Motion for Sanctions**
- **Motion to Compel Discovery**

IV. CONCLUSION AND PRAYER

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests that this Honorable Court:

1. **Grant this Motion for Discovery in full;**
2. **Order the State to produce all requested items within the time frame prescribed by law or a deadline set by this Court;**
3. **Enter any other relief to which the Defendant may be justly entitled.**

Executed on this 1st day of October, 2025.

/s/ _____

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION FOR DISCOVERY OF COMPLETE CASE MATERIALS* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ _____

THIS SPACE INTENTIONALLY LEFT BLANK

©2025 , All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19- 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
[redacted]	§	**DEFENDANT (Pro Se)**

MOTION TO ACCEPT VERIFIED STATEMENT OF FACTS AND REQUIRE REBUTTAL BY OPPOSING PARTY

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted], appearing pro se, and respectfully files this Motion to Accept the Verified Statement of Facts attached hereto as Exhibit A into the Court record and to require the Opposing Party to respond or rebut these facts. This Verified Statement is submitted under penalty of perjury and is based on firsthand knowledge, court documents, and official records. The Defendant requests that the Court consider these facts as established unless rebutted by admissible evidence.

Executed on this 1st day of October, 2025.

/s/ [redacted]

©2025 [redacted] All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO ACCEPT VERIFIED STATEMENT OF FACTS AND REQUIRE REBUTTAL BY OPPOSING PARTY* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/_____

THIS SPACE INTENTIONALLY LEFT BLANK

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19-[illegible]32

STATE OF TEXAS	**§**	**COUNTY COURT AT LAW #5**
	§	
VS.	**§**	**STATE OF TEXAS**
	§	
[illegible]	**§**	**DEFENDANT (Pro Se)**

Exhibit A: Verified Statement of Facts in Support of Motion to Accept Verified Statement of Facts

I, declare under penalty of perjury that the following facts are true and correct to the best of my knowledge:

1. On or about August 7, 2019, a document styled as a "Complaint Affidavit" was created, alleging a belief that the Defendant had intentionally prevented or obstructed an individual identified as J. Pierce from effecting an arrest or transportation. The Complaint Affidavit was signed by an unidentified affiant and an unidentified Assistant District Attorney. On that same date, a separate document titled "Information" was also created by an unidentified Assistant District Attorney. Both documents were subsequently entered into the official court record on August 9, 2019 — with the "Information" document file-stamped at 2:41 PM, and the Complaint Affidavit entered at 3:18 PM. These filings marked the first point of contact initiated by the County of Montgomery judicial system in relation to proceedings allegedly involving the Defendant.

a. Texas Penal Code § 38.03 defines the offense of resisting arrest, search, or transportation as follows:

©2025 [illegible] All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

"A person commits an offense if he intentionally prevents or obstructs a person he knows is a peace officer or a person acting in a peace officer's presence and at his direction from effecting an arrest, search, or transportation of the actor or another by using force against the peace officer or another."

b. The Complaint Affidavit filed against the Defendant, which initiated over six years of continuous legal and personal harm, states verbatim:

"Believes or does believe that the Defendant intentionally prevented or obstructed J. Pierce, a person he knows is a peace officer, from effecting an arrest, search, or transportation of the Defendant by using force against the peace officer."

This affidavit was signed by two unknown individuals whose signatures are illegible and whose identities remain undisclosed.

This Complaint Affidavit fails to meet the legal standards of specificity and factual certainty required for such sworn statements. The use of ambiguous language such as "believes or does believe" evidences uncertainty rather than factual knowledge and renders the affidavit inherently unreliable. Furthermore, the absence of clearly identified and accountable affiants undermines the affidavit's legitimacy and casts doubt on its validity.

The deficiencies in this Complaint Affidavit have contributed directly to the unlawful and ongoing harm suffered by the Defendant, including but not limited to misrepresentation in court proceedings, denial of due process, and the escalation of unjust legal actions based on unsubstantiated and vague accusations.

Furthermore, the Complaint Affidavit that initiated these proceedings was not reviewed or sworn before an impartial judicial officer. Instead, it was sworn and signed solely by the unidentified affiant and an unidentified Assistant District Attorney (ADA) — who simultaneously acted as the verifying authority. This raises a clear and irreconcilable conflict of interest, as the prosecuting office cannot impartially serve as both the author and the authenticating witness of the very document it uses to justify prosecution.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

Under Texas Government Code § 602.002(4), a district or county attorney may administer oaths; however, when that authority is used to self-authenticate an affidavit for which the prosecutor directly benefits, it constitutes a breakdown in the separation of powers and a violation of the Defendant's right to due process.

No neutral magistrate reviewed or verified the allegations, and the vague language used — including "believes or does believe" — further illustrates that the affidavit lacks the specificity and factual foundation required by law. This procedural defect renders the affidavit inherently unreliable and calls into question the lawful basis for the case itself.

2. The Defendant voluntarily appeared at the courthouse on September 30, 2019, in response to a court directive. The Defendant was physically present at the courthouse and delivered filings to the clerk's office, which were time-stamped shortly after submission.

a. It is a matter of public record and commercial fact that the State of Texas operates as a corporate legal fiction, functioning within the broader corporate hierarchy of government entities established under the Government of the United States, which itself is listed as the ultimate parent in numerous public registries, including the D-U-N-S® (Data Universal Numbering System). While the State of Texas may claim sovereign status in relation to other states, it is not sovereign in relation to the Government of the United States, under which it is statutorily bound and commercially subordinate. It exists and functions as a child governmental corporation, operating under federally imposed rules, financial obligations, and administrative structures.

b. Within this same hierarchy, County of Montgomery — styled as County of Montgomery, Inc. — is likewise a municipal sub-corporation, functioning as a child entity under the corporate umbrella of the State of Texas. This cascading structure reveals a commercial chain of command, wherein each "governmental" body operates within a corporate-commercial framework, employing the lexicon of governance while acting under the liabilities, incentives, and operational mechanisms of business.

c. These entities generate substantial revenue not merely through traditional taxation, but more significantly through enforcement mechanisms (fines, fees, arrests, asset forfeitures,

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

court costs), and the sale of rights and privileges in the form of licenses and permits. These acts — including the adjudication of criminal and civil matters — are conducted not solely in the public interest, but with a measurable financial motive. Officers, agents, and agencies involved (including judges, prosecutors, sheriffs, clerks, and jailers) are financially incentivized actors operating within an administrative revenue model.

d. Understanding this structure is vital in assessing the conduct of all involved parties. Actions taken by agents of these corporate-governmental entities — particularly those which violate due process, deny fundamental rights, or act outside constitutional bounds — must be recognized not as abstract procedural errors, but as acts of commercial liability, committed under color of law by agents operating in commerce, under oath and fiduciary duty.

3. The Defendant was driven to court on that day by his mother, who remained on-site as a witness to the appearance.

4. On September 30, 2019, the Defendant was physically present at the Montgomery County courthouse and personally entered multiple sworn documents and affidavits into the official court record. These filings — each time-stamped and recorded by County Clerk Mark Turnbull — included:

a. A Notice of Counterclaim entered at 11:19 AM;

b. A Montgomery County Sheriff's Office Release and Hold Harmless Agreement, signed "No Contract" and initialed by Sergeant Dodson, Badge #5355, entered at 11:20 AM;

c. An Affidavit of Sovereignty entered at 11:21 AM;

d. An Affidavit of Notice of Liability entered at 11:22 AM;

e. An Affidavit of Claim & Title entered at 11:24 AM.

These lawful filings, made under penalty of perjury, stand unrebutted in the court's own record and were submitted approximately thirty minutes prior to the Defendant meeting, in person, with court-appointed attorney David Bluestein [02510700] — an interaction witnessed by the Defendant's mother.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

5. In spite of irrefutable evidence of his physical presence and lawful participation that day, a fraudulent, fictitious, and procedurally manufactured Failure to Appear (FTA) was entered into the record. This act reflects a calculated administrative deception — not a clerical error — and directly contradicts all verifiable facts:

a. The time-stamped entries of official documents filed into the court system;

b. Eyewitness testimony of the Defendant's presence in the courtroom and courthouse corridors;

c. The acknowledgment of the Defendant by state actors, including Sergeant Dodson and attorney David Bluestein [02510700].

This FTA — constructed in defiance of truth — exemplifies the use of deceptive administrative tactics by compensated agents acting under the corporate banner of the State of Texas and County of Montgomery, designed to entrap, suppress, and retaliate against the Defendant's lawful assertion of rights and due process. These events form part of a larger pattern of procedural abuse, psychological coercion, and state-sponsored obfuscation — tactics reflective of intelligence-grade behavioral manipulation, weaponized bureaucracy, and institutional bad faith.

6. Immediately after the September 30 court appearance, the Defendant met with a second court-appointed attorney, David Bluestein [02510700], in the hallway on the 2nd floor right outside the courtroom, who was assigned following the termination of the first court-appointed attorney, Darin John Ray [24003718].

7. David Bluestein [02510700] refused to discuss the case and instead asked irrelevant personal questions, such as the Defendant's educational background and marital status.

8. The Defendant remained as one of the last individuals in the courtroom, excluding court personnel, on September 30, 2019.

9. The Defendant was never formally informed that Darin John Ray [24003718] had withdrawn as counsel, and the only notification on record is a Certificate of Service which incorrectly identifies the notified party in the District Attorney's office.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

10. Darin John Ray's "Motion to Withdraw as Counsel," e-filed September 30, 2019 at 2:04 PM, falsely claims that the Defendant's inability to work with counsel was the cause of the motion.

11. On the first court date, August 21, 2019, Darin John Ray [24003718] failed to appear in court, nor did he notify that he would not be showing up, and instead sent an unidentified woman who attempted to coerce the Defendant into signing a "Scheduling Order" document. This document was already pre-signed by an unknown party and included blank fields for critical information such as the bar number and the assistant district attorney's signature. The Defendant was pressured to sign this document without having full knowledge or consent of its contents, which raises serious concerns about due process and the integrity of court procedures. This act further exemplifies the pattern of procedural irregularities, coercion, and lack of transparency in the handling of the Defendant's case. The acting judge Keith Stewart was well aware of the tactic being used and allowed it.

12. During the entire time that Darin John Ray [24003718] was listed as the Defendant's attorney of record, there was only one direct interaction between him and the Defendant. That interaction occurred on September 30, 2019, halfway through the session, and at no point did Ray make a genuine effort to work with the Defendant.

13. After meeting David Bluestein [02510700] for the first and only time on September 30, 2019, in the courthouse hallway, the Defendant had no further communication with him.

14. In a May 6, 2020 filing titled "Motion to Withdraw as Attorney of Record," Bluestein falsely stated that the Defendant failed to appear on September 30, 2019 and had not been rearrested.

15. This statement is materially false, as the Defendant met David Bluestein [02510700] in person on September 30, 2019, immediately following the court session. The interaction took place in the corridor outside of the courtroom, where Bluestein approached the Defendant and engaged in conversation. This meeting was witnessed by the Defendant's mother, who remained present throughout. The assertion that the Defendant "failed to appear" on that date is therefore knowingly false and constitutes a misrepresentation of the factual record.

16. Bluestein further stated that the Defendant requested a new attorney and was entitled to one, which is also false as the Defendant was never informed or requested a new attorney.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

17. As of September 26, 2025, no new attorney has been appointed or contacted the Defendant.

18. Bluestein's Certificate of Service filed with his motion indicates service to the District Attorney's office but does not mention any service or contact with the Defendant.

19. On October 4, 2019, a "Bailiff Certificate for Bond Forfeiture" was filed, stating that the bailiff called the Defendant's name in the courthouse corridors, allowed reasonable time for appearance, and that the Defendant "wholly made default."

20. This certificate was signed by Bailiff R. Van Howten and an illegible county clerk signature but contradicts the Defendant's verified appearance on September 30, 2019.

21. On October 7, 2019, a Capias (warrant of arrest) was issued and entered into court records at 3:00 PM, citing the Defendant's failure to answer when called in court on September 30, 2019.

22. The Capias document is signed by Acting Judge Keith Stewart and Deputy Clerk Heather Chastun but does not list the District Attorney's name who purportedly moved for bond forfeiture and arrest warrant issuance.

23. An additional "Capias – Order of Arrest (Failure to Appear)" document exists in the court records without a timestamp or date and is signed by Deputy Clerk Heather Chastun.

24. The absence of a timestamp or date on this document is irregular and raises questions about its validity.

25. The Defendant has a telephone recording of a conversation with Tina Long, court administrator for County Court at Law #5, who confirmed she saw the Defendant in court on September 30, 2019.

26. When asked about the issuance of a warrant on that day, Ms. Long refused to provide an explanation and hung up the phone on the Defendant.

27. In an email correspondence, Sally Hepburn, court reporter for County Court at Law #5, confirmed possession of court transcripts for the September 30, 2019 session involving the Defendant.

28.. Hepburn demanded $100 for the transcript and refused to enter the transcript into the court record without payment.

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

29. The Defendant declined payment but requested that the transcript be entered into the court record as it would prove his appearance and disprove the fraudulent warrant.

30. Hepburn ceased communication after this request and has not responded further.

31. The Defendant is a natural living man, not a corporate fiction, and retains all natural rights under common law and constitutional protections.

32. The actions, omissions, and false statements by court personnel, attorneys, and officials constitute neglect, bad faith, and violations of due process.

33. The failure to provide effective legal representation and to properly communicate with the Defendant undermines the validity of any active case, warrant, or order issued in this matter.

34. The Defendant has endured severe and ongoing personal and professional harm, including the loss of government identification, licenses, income, the ability to work and drive, and sustained emotional and legal distress for more than six years. These injuries have been directly caused by the deliberate, coordinated, and financially motivated actions of agents operating under State of Texas Inc. and County of Montgomery Inc., whose conduct reflects a pattern of systemic abuse, deprivation of rights, and coercive tactics designed to break down the will, livelihood, and standing of the Defendant.

35. This Affidavit is submitted for the purpose of establishing a clear, accurate, and lawful record of events, supported by firsthand knowledge and evidence. It stands as a formal demand for accountability from court officers and agents whose conduct has resulted in harm, deprivation of rights, and procedural violations. It also serves as foundational support for the filing of related lawful instruments, including but not limited to a Motion to Recuse the Presiding Judge, and any other lawful or equitable remedies deemed necessary and appropriate by the Defendant.

Executed on this 1st day of October, 2025.

/s/

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *Exhibit A: Verified Statement of Facts in Support of Motion to Accept Verified Statement of Facts* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature _____

THIS SPACE INTENTIONALLY LEFT BLANK

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19- 32

STATE OF TEXAS	§	**COUNTY COURT AT LAW #5**
	§	
VS.	§	**STATE OF TEXAS**
	§	
	§	**DEFENDANT (Pro Se)**

Motion to Compel Production of Court Transcripts and Request for Affidavits

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, [redacted] appearing pro se, and files this *Motion to Compel Production of Court Transcripts and Request for Affidavits* related to the hearing on September 30, 2019. This motion seeks:

1. **The compelled inclusion of official court transcripts from the September 30, 2019 hearing into the court record; and**
2. **A formal request for affidavits from the following individuals attesting to their personal knowledge, observations, and whereabouts concerning the Defendant's physical presence in court on that date:**

   a. Acting Judge Keith Stewart
   b. Court-Appointed Attorney David Bluestein
   c. Court-Appointed Attorney Darin John Ray
   d. Bailiff R. Howton
   e. Assistant District Attorney (Name Unknown)
   f. Court Administrator Tina Long

©2025 [redacted] All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

g. Sally Hepburn, Court Reporter

h. Security personnel who guarded the courtroom door, identified as Ms. Acosa (blonde-haired woman) and Mr. Weatherford (male)

I. BACKGROUND

1. **The Defendant appeared in court on September 30, 2019, and submitted three affidavits and a counterclaim which were accepted into the official court record.**
2. **The Defendant personally met with court-appointed attorney David Bluestein in the courtroom corridor after the court session on September 30, 2019.**
3. **Despite the Defendant's presence, an "Order for Issuance of Capias" was later entered falsely claiming the Defendant failed to appear on September 30, 2019.**
4. **To verify the Defendant's actual attendance, court transcripts from the hearing on September 30, 2019, are necessary and have not yet been filed or produced.**
5. **The Defendant requests the Court to compel the court reporter to provide a certified copy of these transcripts to establish the Defendant's presence.**
6. **The Defendant further requests the Court to order affidavits from the court-appointed attorneys, Darin John Ray and David Bluestein, stating whether they were physically present in court or in the hallway or corridor and whether they personally saw the Defendant on September 30, 2019.**
7. **These affidavits are necessary to clarify any disputes regarding the Defendant's attendance and to address inaccuracies that have led to bond forfeiture and a warrant.**
8. **Sally Hepburn, the court transcriber, was contacted via email and confirmed that she has reviewed the transcripts from the September 30, 2019 court session. She verified that the Defendant is present in those transcripts. Ms. Hepburn demanded $100 for the Defendant to purchase a copy of the transcripts. The Defendant requested that she place the transcripts into the official court record, but she refused, stating that she must sell the Defendant the**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

transcripts before he can use them as he wishes. The Defendant's sole purpose for obtaining the transcripts is to prove his physical presence in court on September 30, 2019—the same day that Acting Judge Keith Stewart, Bailiff R. Howton, an unknown Assistant District Attorney, Court-Appointed Attorney David Bluestein, and Court Administrator Tina Long all acted together to issue a fraudulent $10,000 warrant for failure to appear and to forfeit the Defendant's $750 bond.

II. REQUEST FOR RELIEF

WHEREFORE, the Defendant respectfully requests that this Court:

a. Compel the production and filing of the official court transcripts from the hearing held on September 30, 2019.

b. Order court-appointed attorneys Darin John Ray and David Bluestein to provide sworn affidavits regarding their presence or absence and any direct observation of the Defendant on September 30, 2019.

c. Grant any other relief to which the Defendant may be justly entitled.

III. PRAYER

The Defendant prays that the Court grant this Motion and any other relief deemed appropriate and necessary to ensure a fair and accurate record of the Defendant's court attendance.

Submitted by:

/s/ _____

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Compel Production of Court Transcripts and Request for Affidavits was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/_____

©2025 . All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19 32

STATE OF TEXAS	**§**	**COUNTY COURT AT LAW #5**
	§	
VS.	**§**	**STATE OF TEXAS**
	§	
	§	**DEFENDANT (Pro Se)**

MOTION TO VERIFY RECOGNITION AND PROTECTION OF CONSTITUTIONAL RIGHTS

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defenda appearing pro se, and moves this Court to formally verify whether it recognizes, upholds, and intends to protect the Defendant's guaranteed constitutional rights throughout the entirety of these proceedings, and in support states as follows:

1. **The Defendant is entitled to the full protection of the Constitution of the United States and the Texas Constitution, including but not limited to:**
    - **The right to due process under the Fifth and Fourteenth Amendments;**
    - **The right to equal protection under the law;**
    - **The right to effective assistance of counsel under the Sixth Amendment;**
    - **The right to be presumed innocent until proven guilty;**
    - **The right to confront witnesses and present a defense;**
    - **The right to be free from cruel and unusual punishment under the Eighth Amendment;**
    - **The right to remain silent and not be compelled to incriminate oneself;**
    - **The right to a fair, impartial, and public trial by jury.**

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

2. **The Defendant seeks confirmation on the record that this Court acknowledges and affirms these rights as binding and enforceable throughout all proceedings and will ensure these protections are not waived, ignored, or denied.**

3. **The Defendant further requests that if this Court does not recognize the enforceability of any of the above-listed rights, it state specifically:**
   a. Which rights are not recognized or enforceable;
   b. The legal authority or statutory rule used as the basis for such non-recognition;
   c. The constitutional or legal doctrine being applied in substitution, if any.

4. **The Defendant submits that failure to affirmatively recognize and protect these constitutional rights constitutes a due process violation and may render any further proceedings invalid, void, or subject to challenge under applicable state and federal law.**

5. **The Defendant further requests a formal written order or acknowledgment from the Court addressing this motion and entering into the record a definitive statement of the Court's position regarding the recognition and enforcement of the Defendant's constitutional rights.**

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully moves this Court to enter an order verifying and affirming the recognition, application, and protection of the Defendant's constitutional rights for the duration of these proceedings, and to issue any other relief deemed just and proper.

Submitted by:
/s/ _____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Verify Recognition and Protection of Constitutional Rights was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ _____

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CAUSE NO. 19· 32

STATE OF TEXAS	**§**	**COUNTY COURT AT LAW #5**
	§	
VS.	**§**	**STATE OF TEXAS**
	§	
	§	**DEFENDANT (Pro Se)**

MOTION TO COMPEL CLERK TO EXPLAIN RECORD IRREGULARITIES

TO ACTING JUDGE OF SAID COURT:

COMES NOW the Defendant, appearing pro se, and moves this Court to compel the County Clerk, Brandon Steinmann, to provide a full accounting and explanation regarding the following procedural irregularities observed in the official court record for this case:

1. **Numerous documents have been filed without any signatures or with signature lines left blank.**
2. **Certain documents contain illegible scribbles, initials, or symbols in place of actual names or identifiable signatures, making it impossible to determine who signed or authorized such filings.**
3. **Some filings bear handwritten notations, numbers, or unclear markings substituted for standardized or official identifying information.**
4. **Despite these deficiencies, these flawed documents were accepted and entered into the official court record by the Clerk's Office without correction, rejection, or further verification, which constitutes a failure to uphold procedural and statutory duties governing court records.**

WHEREFORE, the Defendant respectfully requests that the Court order the County Clerk, Brandon Steinmann, to:

©2025 , All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

a. Provide a comprehensive list of all documents filed in this case that:

i. Were entered without signatures;

ii. Contain illegible or unreadable signatures; or

iii. Were incomplete or missing required information at the time of filing;

b. Identify by full legal name, official job title, contact information, and any available employee or identification number:

i. Every individual who signed any such document (including those with illegible signatures);

ii. Every individual who accepted, filed, or entered such documents into the official court record;

c. Provide a detailed explanation for the acceptance and filing of each deficient document, including the identity of the individual(s) who authorized their entry despite the deficiencies;

d. Furnish copies of all internal policies, procedures, manuals, or checklists utilized by the Clerk's Office to review and vet documents prior to filing in the court record.

These matters directly affect the integrity and reliability of the official court record, raise substantial due process concerns, and are necessary for the Defendant's ability to prepare a proper defense. Failure to comply with this motion may result in the Court drawing adverse inferences against the Clerk's Office and may prompt further motions or complaints regarding the administration of justice.

/s/ [redacted]

©2025 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this *MOTION TO COMPEL CLERK TO EXPLAIN RECORD IRREGULARITIES* was delivered to the Montgomery County District Attorney's Office on this 1st day of October, 2025, by eFileTexas.org.

Signature: /s/ .

THIS SPACE INTENTIONALLY LEFT BLANK

©20 All rights reserved. Unauthorized reproduction or distribution is prohibited.
Exhibit:_____